



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
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PUBLIC AFFAIRS

October 12, 2010

Ms. Kimberly Kler
Naval Facilities Engineering Command Northwest
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

**Re: U.S. Environmental Protection Agency (EPA) review and comments for the U.S. Navy's (Navy) Northwest Training Range Complex (NWTRC) Final Environmental Impact Statement/ Overseas Environmental Impact Statement (EIS/OEIS).
EPA Project Number: 07-035-DOD**

Dear Ms. Kler:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement.

We continue to appreciate the Navy's generally excellent environmental analysis. The following changes made between the Draft EIS/OEIS and the Final EIS/OEIS were responsive to our concerns.

- Changes made to chapter 5 of the EIS/OEIS addressed our concern that larger shut down zones for Mid-Frequency Active (MFA) sonar were considered but eliminated based - in part - on the limitations of lookouts for marine mammal monitoring. Your additional information more clearly discloses and emphasizes the scientific evidence for the size of the power down and shut down zones that were developed in coordination with the National Marine Fisheries Service (NMFS).
- Because advancing the effectiveness of mitigation measures, including shut down zones for MFA sonar, depends on new and emerging tools and technologies – we recommended that the Final EIS/OEIS describe how these tools and technologies might be incorporated into marine mammal monitoring and mitigation measures. We appreciate the additional information in Section 5.2.1 and support the Navy's maximum efforts to extend the range and improve the probability of detection of species. Such efforts serve to ensure that well designed mitigation measures achieve predicted environmental benefits.
- To protect water quality in the Olympic Coast National Marine Sanctuary (OCNMS) we recommended the addition of a "No discharge" restriction for all waste types listed in Draft EIS/OEIS Table 3.4-1. Additional information in the Final EIS/OEIS – including your clear response to our comment in Appendix G – shows that National Marine Sanctuaries are prohibited discharge zones for U.S. Navy shipboard wastes. Your revisions clarified this important restriction.

- To more fully disclose the potential environmental risk of tungsten ammunition, we recommended additional information on the use of tungsten Close-In Weapon System (CIWS) rounds. Additional information in Section 3.3.1.1 of the Final EIS/OEIS is responsive to our concern by addressing the ammunition's materials composition, solubility in salt water and potential toxicity for marine life.

With regard to Greenhouse Gas (GHG) emissions, we recommended an annual emissions analysis as well as the consideration of several voluntary GHG reduction measures. We reiterate our support for GHG analyses to increase preparedness for and decrease potential costs associated with meeting local, county, state, regional, national, and international responses to climate change.¹ We note that the Whitehouse Council on Environmental Quality has just published, on October, 6 2010, the Guidance on Federal Greenhouse Gas Accounting and Reporting.² This Guidance establishes Government-wide requirements for measuring and reporting GHG emissions associated with Federal agency operations. The guidance is accompanied by a separate Draft Technical Support Document that provides detailed information on Federal inventory reporting requirements and calculation methodologies. We understand that accounting for and continually reducing GHG emissions is one of many reasons the Navy actively pursues substantial energy conservation efforts. We support these ongoing efforts and encourage the maximum implementation of new energy conservation strategies, tools and techniques; such as using modular and mobile energy sources and committing all Naval Stations to the Federal Green Challenge.³

Thank you for your responsiveness and this opportunity to comment. If you have any questions please contact Erik Peterson of my staff at (206) 553-6382.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

¹ Consider, for instance, Local Governments for Sustainability, King County Climate Plan, Northwest Regional Greenhouse Gas Initiative, Western Climate Initiative, the Energy Independence and Security Act of 2007 and the Bali Action Plan.

² <http://www.whitehouse.gov/administration/eop/ceq/sustainability/fed-ghg>

³ <http://yosemite.epa.gov/r10/ECOCOMM.NSF/Federal+Green+Challenge/FedGreen>